



iMessage  
Tue, Feb 12, 8:31 PM

Can you pls send me your email address? Thanks.

Wed, Feb 13, 7:15 AM

[april.perry@cookcountyil.gov](mailto:april.perry@cookcountyil.gov)

Just sent you a Dropbox link.

Wed, Feb 13, 10:15 AM

We will probably be available earlier than I thought on Friday. We could meet likely around 11:30. Do you have contact info re travel? Thanks.

Lori Smith

LS



Witness coordinator contact info.

Thanks.



iMessage







[REDACTED]

Thanks.

Thu, Feb 14, 6:01 AM

to: MICHAEL AVERILL / nine

**Hello Michael, from Jim DeRogatis in Chicago**

Today at 3:49 AM

Are you representing [REDACTED]  
[REDACTED] with this tape that may  
be making its way to Kim Foxx?  
I've been on this story a long time,  
and I'm wondering if it is about to  
have an end. Of course I know all  
the background. [REDACTED]

[https://www.nytimes.com/  
2019/01/29/business/media/r-  
kelly-jim-derogatis-dream-](https://www.nytimes.com/2019/01/29/business/media/r-kelly-jim-derogatis-dream-)

This did not come from us. I  
have no idea how this leaked.  
Do you know?

Thu, Feb 14, 7:24 AM



iMessage







I do not. But I'm seething.

Me as well. I had to issue a stmt because the press is running with this any way. We need to get him to Chicago.

Agreed. Jim is working on it.

I know. Good guy.

Thanks.

Thu, Feb 14, 10:52 AM

Can you call me re [REDACTED]  
[REDACTED] when you have a chance?

Can you call me when you have a moment, please?

Delivered

Brooklyn USAO office called me and left a message FYI.



iMessage







[Redacted Name]



April 10, 2019

Yesterday 11:07 AM

April - hope you are well. Can you call me regarding [Redacted]  
[Redacted] Thanks. Michael Avenatti

Today 7:22 AM

I'm out of town all week. Can we talk Monday? If not, I'll ask Risa to give you a call.

Delivered



iMessage



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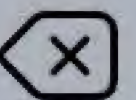
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123



space

return

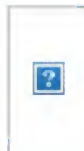
**From:** [APRIL PERRY \(States Attorney\)](#)  
**To:** [JAMES ROACHE \(States Attorney\)](#)  
**Subject:** Fwd: Michael Avenatti shared "KC Lawsuits" with you  
**Date:** Wednesday, February 13, 2019 10:45:45 AM

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Sent from my iPhone

Begin forwarded message:

**From:** "Michael Avenatti \ (via Dropbox\)" <[no-reply@dropbox.com](mailto:no-reply@dropbox.com)>  
**Date:** February 13, 2019 at 7:26:43 AM CST  
**To:** [april.perry@cookcountyil.gov](mailto:april.perry@cookcountyil.gov)  
**Subject:** Michael Avenatti shared [REDACTED] with you  
**Reply-To:** [mavenatti@eaganavenatti.com](mailto:mavenatti@eaganavenatti.com)



Hi there,

Michael Avenatti ([mavenatti@eaganavenatti.com](mailto:mavenatti@eaganavenatti.com)) invited you to edit the folder [REDACTED] on Dropbox.

[Go to folder](#)

Enjoy!

The Dropbox team

[Report to Dropbox](#)

© 2019 Dropbox

**From:** [APRIL PERRY \(States Attorney\)](#)  
**To:** [mavenatti@eaganavenatti.com](mailto:mavenatti@eaganavenatti.com)  
**Subject:** Grand Jury Secrecy  
**Date:** Thursday, February 14, 2019 2:50:00 PM

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Mr. Avenatti,

I am writing pursuant to your request for a letter that discusses whether the Cook County State's Attorney's Office intends to distribute your client's grand jury testimony. Pursuant to 725 ILCS 5/112-6, Illinois grand jury proceedings are secret. The CCSAO, and every employee of the CCSAO, are prohibited from disclosing grand jury testimony except to the extent disclosure is required to perform the State's Attorney's duty to enforce state criminal law. Only the court is allowed to disclose grand jury information, in accordance with the requirements of 725 ILCS 5/112-6.



Please contact me if you have any questions.

Sincerely,  
April Perry

April Perry  
Chief Deputy State's Attorney / Chief Ethics Officer  
Cook County State's Attorney's Office  
69 W. Washington, Suite 3200, Chicago, IL 60602  
P: 312.603.1824 E: [april.perry@cookcountyl.gov](mailto:april.perry@cookcountyl.gov)



iMessage with [REDACTED]

2/8/19, 9:40 AM

Depart Washington, DC to Los Angeles, CA  
Saturday, February 9, 2019

Flight	Depart	Arrive	Travel time	Aircraft	Class	Notes
2784 American Airlines	9:35 AM DCA	10:52 AM ORD	2h 17m	738	Economy	
On time	Estimated 9:35 AM	Estimated 10:52 AM				
	Terminal -- Gate --	Terminal T3 Gate K16 Baggage --				
See you to on Feb 9	Stop Chicago (ORD)					
2611 American Airlines	1:31 PM ORD	4:02 PM LAX	4h 31m	328	Summary	261
	Estimated 1:31 PM	Estimated 4:02 PM				
	Terminal T3 Gate H17	Terminal 5 Gate 53A Baggage --				
See you to on Feb 9						

Good morning Kim. Please see above. I land at 10:52. Perhaps we could meet at the Ohare Hilton immediately after I land? Alternatively, if there is a location at ohare that you have access to that would work as well. Best, Michael

2/8/19, 11:06 AM

Good morning. Looking to see if we can find a private space at O'hare such that you don't have to worry about security. I'll let you know where shortly.

2/8/19, 11:06 AM

Good morning. Looking to see if we can find a private space at O'hare such that you don't have to worry about security. I'll let you know where shortly.

Thanks. Let me know.

2/8/19, 3:16 PM

An investigator from my office will meet you at your gate and escort you to an office we secured.

Excellent. Thanks Kim. I look forward to it and thank you for being so accommodating.

Thank you Michael. Look forward to meeting.

2/11/19, 7:32 PM

Hey! Hope all is well. I'm Wanted to check in with you. I'm traveling today and tomorrow. I'll try you tomorrow.

Just tired you back

Tried



2/12/19, 8:50 AM

Morning. Let me know when we can chat today re timing.

Morning. Speaking at a conference this morning in Tampa, so tied up until midday. I'll reach out then. Preliminarily looking at Friday or Monday.

Thanks. Good luck today. Friday may be tough with my schedule but let me check. Monday is a holiday. Tuesday may be best.

Thanks! We'll look towards Tuesday. I'll be in LA but the team will be ready. Looking forward to talking later today.

2/12/19, 1:22 PM

It turns out Friday is much better. If there is any way we can make it Friday, that would be better for everyone. The sooner the better.

2/12/19, 2:37 PM

Are you free?


For a call now that is.

[REDACTED]

Yes. What's the best way to handle?

Lori Smith from my office. The office is closed today for Lincoln's Birthday holiday. I want to give her a heads up, and ensure her confidentiality before you call.


No problem. Appreciate it.

 April Perry

My chief deputy you met at the airport. Can discuss the mechanics and perimeters of the testimony as well as the letters we discussed.

Thanks. I will call her

2/13/19, 10:46 AM

 Lori Smith

Witness coordinator re [REDACTED]  
[REDACTED]



Got it. Thank you!

2/14/19, 5:56 AM

Please see attached. I have no idea where this came from but it wasn't from us.

3:55



< Inbox



From: **Jim DeRogatis** >

To: **Michael Avenatti** >

Hide



**Hello Michael, from Jim DeRogatis in Chicago**

Today at 3:49 AM

Are you representing [REDACTED]  
[REDACTED] with this tape that may be making its way to Kim Foxx? I've been on this story a long time, and I'm wondering if it is about to have an end. Of course I know all the background [REDACTED]

<https://www.nytimes.com/2019/01/29/business/media/r-kelly-jim-derogatis-dream-hampton.html>

(And many others)



(And many others)



2/17/19, 9:57 AM

Kim - I need to give you an update on something. Do you have 5 min this morning?

Sure

Sure.

Sending link to entire document as well

remains necessary to determine whether a case was still viable when the 2000 change occurred.

#### The Formula (Minor Victims Only)

If the sexual crime occurred after July 1, 1984, and the victim was a minor (under 18) when the crime occurred:

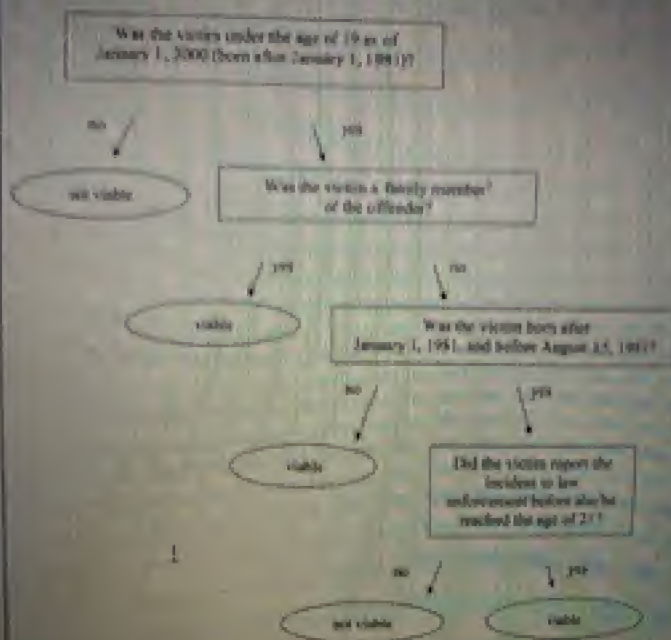
1. Was the victim under the age of 18 as of January 1, 2000 (born after January 1, 1981)?
  - If "no," the case is not viable.
  - If "yes," continue.
2. Was the victim a family member to the perpetrator ("family member" being defined by 720 ILCS 5/12-12(a))?
  - If "yes," the case is viable.
  - If "no," continue.
3. Was the victim born after January 1, 1981, and before August 15, 1981?
  - If "no," the case is viable.
  - If "yes," continue.
4. Did the victim report the incident to law enforcement by age 18?
  - If "no," the case is not viable.
  - If "yes," the case is viable.

\* For cases started before August 15, 1981, the duty to report by the age 18 is not applicable and continuing victim status is required.

Thanks



### Child Victim



Is this analysis for child sex abuse/assault, because I believe your right. The issue is to child porn statute.



Statutes of Limitations

[icasa.org](http://icasa.org)

2/17/19, 7:55 PM  
We're within the statute.

Excellent news.

2/18/19, 9:11 AM

Good morning. Can you give me a call back when you get a chance? Thanks.

It's about [REDACTED]

Headed to the airport shortly. I'll give you a call in about an hour. Are you in LA? I'm headed there.

No. east coast. Sounds good.

2/19/19, 7:44 PM

Do you have 2 min for an update?

2/19/19, 9:20 PM

Just landed. Sure.

Just tried you.

2/20/19, 8:23 AM

[REDACTED]  
I'm free this morning.

2/21/19, 7:11 PM

Hi Kim. Can you give me a call?



2/21/19, 7:11 PM

Hi Kim. Can you give me a call for a brief chat? I want to share something with you.

2/21/19, 8:57 PM

Black thumb only!

Understood. Let me know when I can schedule it. I'll call it for after yours. Have a good night. And thanks as always.

2/22/19, 12:45 PM



My press conference is at 2

Congrats Kim. You and your staff have been excellent to work with and we will continue to do whatever we can to assist.

2/22/19, 3:15 PM

Hi there. I now represent [REDACTED]

[REDACTED] They are concerned about R Kelly harming [REDACTED] while he awaits being placed in custody. What can I tell

Hi there. I now represent [REDACTED]

[REDACTED] They are concerned about R Kelly harming [REDACTED]

[REDACTED] while he awaits being placed in custody. What can I tell them? I know you are buried.

[REDACTED]

2/22/19, 8:24 PM

Great job. You got this.

3/3/19, 7:04 PM

Kim - hope your weekend is going well. I may be coming in to represent the brothers in the Smollett case. I know you recused yourself. Who is in charge that I can speak with?  
Best, Michael

3/3/19, 8:22 PM

My number 2, Joe Magats.

312.603.1824

Office is closed tomorrow for a local holiday. But I'll ping him and send him your number.



I figured as much. Thanks Kim

2/22/19, 8:24 PM

Great job. You got this.

3/3/19, 7:04 PM

Kim - hope your weekend is going well. I may be coming in to represent the brothers in the Smollett case. I know you recused yourself. Who is in charge that I can speak with?  
Best, Michael

3/3/19, 8:22 PM

My number 2, Joe Magats.

312.603.1824

Office is closed tomorrow for a local holiday. But I'll ping him and send him your number.

Delivered

Thanks Kim. Appreciate it. All the best.

